

**Alaska  
AFCARS  
Assessment Review  
Report**

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and  
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U.S. Department of Health and Human Services**

## Executive Summary

From June 11 - 15, 2007, staff of the Children's Bureau, Central and Regional Offices, and the Office of Information Services (OIS) conducted an assessment review of Alaska's Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the State's system ORCA (Online Resource for the Children of Alaska). The AFCARS data used for the review was from the report period April 1, 2006 through September 30, 2006 (2006B).

Two major areas are evaluated as part of an AFCARS Assessment Review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements and 26 of the 27 AFCARS general requirements is assessed on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element and general requirement. A scale of zero (State's Statewide Automated Child Welfare Information System (SACWIS) does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" matrices for the general requirements, the foster care and adoption data elements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

### General Requirements (26)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (15)
4	6	2	11
3	2	0	1
2	0	1	3
1	0	0	0

### Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	9 (14%)	16 (43%)	25 (24%)
3	17 (26%)	4 (11%)	21 (20%)
2	37 (56%)	17 (46%)	54 (52%)
1	3 (4%)	0	3 (3%)

As noted in the above table, the State is mostly in compliance with the reporting population requirements for the foster care and adoption files. The State currently is incorrectly including in the foster care population youth over the age of 18, or 19 if the child had been eligible for title IV-E funds. Also, children whose only removal episode in a prior episode was 24 hours or less are incorrectly included in the count of removals when the subsequent removal occurs. All removal episodes of less than 24 hours are not to be included in the reporting population.

The State is not in full compliance with the reporting of its adoption population because private agency adoptions in which the agency is involved due to an adoption assistance agreement are not included in the reporting population.

In regard to the technical standards, the State consistently has errors in its summary files when submitting the six-month AFCARS data. Also, there is no means in the extraction code to ensure that all of the agency-involved adoptions are reported, or that previously submitted adoptions are not resubmitted. There were issues identified with the quality of the data and the ability of the system to record historical data resulting from conversion to ORCA. Not all removal episodes were entered into the system at the time of conversion. Additionally, there are placements that occurred prior to the conversion that were not entered for open cases. This information is crucial to the evaluation of a State's child welfare practices. In order to determine if the number of children re-entering foster care is actually increasing or decreasing, a complete removal history is needed in the information system.

There are several technical changes required for the foster care and adoption data elements. Many of the elements that received a rating of two are in the same group (e.g. race), and are relatively simple changes to the program code. There are several areas where the State's system must be modified. These include changes to the collection of the diagnosed disability information, conditions associated with removal, mother married at the time of the child's birth, and the relationship between the child and the individuals adopting him or her.

The State currently has two locations that records a child's diagnosed condition. The area being used for AFCARS, the client tab of the person management screen, does not adequately collect the child's diagnosed conditions and lends itself to both underreporting of the data and incorrect data entry by the case workers. The State's medical profile section is a much more comprehensive and accurate location for the collection of a child's diagnosed needs and is the section that should be used for the collection and reporting of the AFCARS data.

The location where the information is collected regarding mother's marital status at the time each child is born is collected on an adoption screen. This information should be collected on all children at the time they enter foster care. The collection of this information relates to the assessments the agency conducts on the family when first becoming involved with the family.

Lastly, the State is not reporting all possible relationships between the child and the people that adopt him or her. For instance, if the foster parents of a child make the decision to adopt the child and happen to also be relatives, then the State's AFCARS file needs to reflect both of these relationships.

Once changes are made to the system and the extraction code, underlying data quality issues may surface. These elements and those that received a rating factor of "3" will require additional training and supervisory oversight for the timeliness and accuracy of data entry.

Additionally, changes made to the program code will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter

the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office, OIS, and the Children's Bureau with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to the Regional Office and the Children's Bureau.

The State should contact the Regional Office once it has completed its AIP. The Regional Office will then provide the State with another set of test cases. These scenarios test the technical changes made to the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the Regional Office. The State will receive a letter summarizing the final results of the review.

The Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your Regional Office.



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## BACKGROUND

Data for the Adoption and Foster Care Analysis and Reporting System (AFCARS) are required by Federal law and regulation. The data are to be collected on children in foster care and those who have been adopted under the auspices of the State child welfare agency. States that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E State plan, and are subject to penalties<sup>1</sup>. Additionally, States that received funding to develop, implement, and operate a Statewide Automated Child Welfare Information System (SACWIS) under Federal regulations at 45 CFR 1355.53 are to produce a comprehensive, effective, and efficient system to improve the program management and administration of the State plans for titles IV-B and IV-E of the Social Security Act. At a minimum, the system must provide for effective management, tracking, and reporting by providing automated procedures and processes to, among other things, meet the adoption and foster care reporting requirements through the collection, maintenance, integrity checking, and electronic transmission of the data elements specified by the AFCARS requirements.

The Children's Bureau is committed to assisting States to develop statewide child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews (AAR) were developed to assure that the systems support the management of the programs under titles IV-B and IV-E and can produce accurate and reliable foster care and adoption data. AFCARS Assessment Reviews are conducted in every State, regardless of whether a State operates a SACWIS. The State's information system is assessed against the AFCARS requirements in the Federal regulation, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the ACF. A second focus of the AAR is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data are also compared against a small, randomly

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<sup>1</sup> The Administration for Children and Families is not assessing AFCARS penalties at this time (see ACYF-CB-IM-02-03) and will not take penalties until new, final AFCARS regulations are issued implementing P.L.108-145 (The Adoption Promotion Act of 2003).



selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

## **RATING FACTORS**

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements, and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements, and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of zero (the system is not collecting the AFCARS data elements and the data are not transmitted) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

<b>RATING FACTOR</b>	<b>DEFINITION</b>
4	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.
3	There are data quality issues. For example: <ul style="list-style-type: none"><li>• The data are underreported due to inconsistent data entry.</li><li>• The data are not being entered.</li><li>• Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens.</li><li>• There are no supervisory controls for ensuring data entry, or accurate data entry.</li><li>• Incorrect data entry due to training or design issues.</li><li>• Missing or incomplete data due to conversion errors.</li></ul>
2	The technical requirements for AFCARS reporting are not fully met. For example: <ul style="list-style-type: none"><li>• The State information system has the capability to collect the data, but the program logic is incorrect.</li><li>• The State uses defaults for blank information.</li></ul>

	<ul style="list-style-type: none"> <li>• Information is coming from the wrong module or field in the system.</li> <li>• Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens.</li> <li>• The system needs modification to encompass more conditions, e.g., disability information.</li> <li>• The extraction code for the AFCARS report selects and reports incorrect data.</li> </ul>
1	<p>An AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> <li>• The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens).</li> <li>• There is no program logic to extract the information.</li> <li>• There is 100% missing data according to the frequency report or DCU/DQU reports.</li> </ul>
0	<p>States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 0 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

## FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS

requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period April 1, 2006 through September 30, 2006 (2006B).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, team member notes, and the States' corrected program code were assessed to make the final determination of findings. Tab A contains the findings matrices for the general requirements, the data elements, and the case file review.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the finding(s), the task(s), the date the task is estimated to be completed, and one for comments. Additionally, the State should review the Wisconsin AFCARS Assessment Review Report for suggestions regarding changes that were required for both systems. The Report can be found on the Children's Bureau's web site at [http://www.acf.hhs.gov/programs/cb/stats\\_research/afcars/aar/index.htm](http://www.acf.hhs.gov/programs/cb/stats_research/afcars/aar/index.htm).

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office, OIS, and the Children's Bureau with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Angelina Palmiero in the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed the implementation of the AIP, notify the Regional Office. The Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted as changes to the system and training are addressed, and after all system changes and training are completed. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions based on the test cases have been completed, the State must submit the completed AIP to the Regional Office. The State will receive a letter summarizing the final results of the review.

The Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your Regional Office.

## **General Requirements**

### **Foster Care Population**

The State currently is incorrectly including in the foster care population youth over the age of 18, or 19 if the child had been eligible for title IV-E funds. The State will need to develop a method to report these youth as discharged as of their 18<sup>th</sup> birthday, or the day in which the youth is no longer title IV-E eligible. The outcome is to be reported as “emancipation.”

Also, children whose only removal episode in a prior episode was 24 hours or less are incorrectly included in the count of removals when the subsequent removal occurs. All removal episodes of less than 24 hours are not to be included in the reporting population. Modifications are needed for the extraction of foster care elements #18, 19, and 20.

### **Adoption Population**

A significant issue with the reporting population is that the State is not reporting adoptions that occur through a private agency, but the Office of Children Services has involvement due to an adoption agreement. The system must be modified to include these adoptions in ORCA and the program code must be modified to select and extract these cases during the AFCARS submission.

### **Technical Standards**

In regard to the technical standards, the State consistently has errors in the summary file when submitting the six-month AFCARS data file. The State and Federal team identified a possible cause and this issue should be resolved by the time the State submits its data file for the April through September (2007B) collection period. Also, there is no means in the extraction code to ensure that all of the agency involved adoptions are reported, or that previously submitted adoptions are not resubmitted.

There is a significant problem in the accuracy of historical information in the AFCARS files. Specifically, the State is not accurately reporting all prior removal episodes for a child, incorrectly reporting the start date of current removal episodes, underreporting the number of placements a child had during the current removal episode, and dates of termination of parental rights. These issues are related to a lack of complete data conversion when the State implemented ORCA. The State will need to complete data conversion and ensure the completeness of all the data. This information is crucial to the evaluation of a State’s child welfare practices.

## **Data Elements**

The State received a rating of “1” on three foster care elements. There were 52% of the data elements that received a rating factor of two; 37 (56%) foster care elements and 17 (46%) adoption elements require system and program code modifications. This may involve a screen

design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface.

The State made some corrections to the program code based on the preliminary findings of the on-site review. These revisions were submitted to ACF after the on-site visit in time to be incorporated into the final findings. The original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a “strike-through” mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

### Technical Areas

- Source(s) of Federal financial support/assistance for child (Foster care elements #59 - 65)

The State’s system is unable to collect three of these elements: title IV-A, Social Security Income, or sources of support that are State or from some other source (Federal or non-Federal). The State is developing interfaces with the title IV-A information system and the Social Security office as part of its SACWIS improvement plan. ORCA may have the capacity to record the information for these elements, but would require some modifications. The State needs to develop a means to report this information regardless of the status of implementing the interfaces for its SACWIS. This is data that is required for AFCARS reporting.

- Child Disability Information (Foster Care Elements #10 - 15)

For AFCARS reporting purposes, the information reported for these elements reflects chronic and/or significant diagnosed conditions that the child may have. A resource list of conditions to be mapped to AFCARS is listed on the Children’s Bureau’s web page at <http://www.acf.hhs.gov/programs/cb/systems/afcars/resources.htm>.

Alaska’s AFCARS data indicate an underreporting of this information. The case file review revealed that 14% of the records analyzed indicated that the child did have a diagnosed disability, but the response in AFCARS indicated the child had not been seen by a health professional (AFCARS value “not yet determined”).

There are several factors that could be contributing to the underreporting of this information. The most significant one is how the system is designed. There are two sections of the system that case workers complete related to the health of a child. One is on the “person management” screen. Here the system contains the AFCARS question with the same responses as in AFCARS. There also is a “Medical Profile” section that records exam dates and diagnosis. The medical profile page documents medications, Axis I and II Diagnoses and other medical information. This section captures more robust information for the reporting of diagnosed disability information than the fields on the “person management” screen. During the State’s Statewide Automated Child Welfare Information System (SACWIS) Assessment Review in

2005, this area was identified as an issue. In addition to issues listed above, another issue is that having the two separate locations in the system results in duplicative data entry.

The medical profile is a good section in the system for recording the health and mental health conditions of a child. This section would allow for the recording of the actual diagnosed condition, which then can be mapped to the appropriate AFCARS category. This would provide more accurate data, also, because then the case worker would not have to guess which category a diagnosis belongs to. Currently, the diagnosis fields on the medical profile screens are not captured in a database table, they are only text fields. These should be stored in a table for reporting purposes.

Lastly, there needs to be additional oversight by supervisors to ensure that case workers enter the diagnosed conditions into the system. The State must develop a longer term solution to ensure that if a child is diagnosed with any health, mental, behavioral health, or educational condition, it is entered into the information system.

- Actions or Conditions Associated with Child's Removal (foster care elements #26 - 40)

The screen in ORCA that collects this information is a list of check boxes that allow the case worker to select all that apply. During the case file review an issue was identified with the elements related to drug and alcohol abuse by parent or child (foster care elements #29 - 32). The issue seems to be the way the fields are worded on the screen. These elements are listed in the following order: "alcohol abuse – child," "drug abuse – child," "alcohol abuse – parent," "drug abuse – parent." The case workers are selecting the first options, which are for the child, when they actually mean to select the options for the parent. The State should consider either changing the order of the label or reversing the order of the selections.

Additionally, all these elements were found to be underreported during the case file review. The State needs to focus more training and supervisory oversight on the purpose of these elements and its importance for accuracy.

- Mother married at time of child's birth (adoption element #18)

This is another significant system modification. Currently, the field to collect this information is located on the adoption referral, birth parents screen. The issue is that this is information that needs to be collected at the time a child enters foster care. The accuracy of the information will improve if this field is added to a screen that collects basic demographic information or is part of the assessments.

- Child's relationship to the individuals adopting him/her (adoption elements #29 – 32)

AFCARS allows this to be a multi-select field and the State is currently only capturing one relationship. The relationship that was underreported is when the adopting parents were also foster parents.

The State should note that changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. Once the above program and system corrections are made, the State must ensure that the case workers understand what needs to be recorded in the child's case file and supervisors ensure that data are entered into the system timely and accurately.

### Data Quality

Twenty percent of the data elements received a rating factor of three; 17 (26%) foster care and 4 (11%) adoption elements require additional training and supervisory oversight for the timeliness and accuracy of data entry. As noted above, conversion of data is also a factor in the accuracy of the data.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. In order to ensure the data are complete, the agency must require workers to enter the data timely, increase supervisory oversight, and incorporate the AFCARS data into ongoing quality assurance processes.

The State's semi-annual data submission may, as a result of the technical corrections, fail to meet the missing data standard. The State needs to assess the validity of the data on an ongoing basis and prior to submitting the AFCARS files to the Children's Bureau. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by the Children's Bureau. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.